

MEMO ENDORSED**SITARAS & ASSOCIATES, P.C.**

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E-MAIL: PETER@SITARASLAW.COM
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☐ denied.

April 5, 2013

Edgardo Ramos, U.S.D.J.Dated: April 8, 2013

White Plains, New York

Discovery cutoff is extended to
May 24, 2013. The Status Conference
is rescheduled until May 31, 2013
at 11:00am.

VIA FACSIMILE

(914) 390-4298

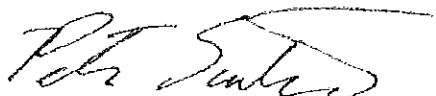
The Honorable Edgardo Ramos
United States Courthouse
300 Quarropas Street, Room 218
White Plains, New York 10601Re: *Shawnlee Construction, LLC v. Arch Insurance Co. et al.*
(Case No. 12-cv-03346 ER)
REQUEST FOR EXTENSION OF TIME

Dear Judge Ramos:

We are counsel to plaintiff Shawnlee Construction, LLC ("Shawnlee"), and are writing to request, jointly with defendant Arch Insurance Co., an extension of the discovery deadline from April 10, 2013 to May 24, 2013. An extension is necessary to complete the depositions that remain in this case. This is the first request for an extension, and the parties conducted non-party depositions prior to good faith, albeit ultimately unsuccessful, attempts to negotiate a settlement. The extension does not affect any other scheduled dates in the Court's Civil Case Discovery Plan and Scheduling Order.

Thank you for your consideration of this request.

Respectfully submitted,



Peter Scutero

cc: Lawrence Novak, Esq. (via e-mail)
Steve Rittmaster, Esq. (via e-mail)
George Sitaras, Esq. (via e-mail)

USDC SDNY
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